

The Initial Public Discussion Draft of Revisions was posted online to the Short-term Rental Regulations update project webpage (<https://www.larimer.gov/planning/short-term-rentals-regulation-updates>) on October 27, 2022. The draft document was available to the public for review and feedback from October 27, 2022, to December 14, 2022. The following provides a summary of the ideas or thoughts expressed in over 180 public feedback emails received during the review period. Feedback was received from across the County.

Additional feedback on the Initial Public Discussion Draft of suggested revisions was gathered from the public at two separate webinars that took place at the beginning of November. Following those webinars, the project team summarized the feedback and posted that information to the project webpage.

All public comments received to date will be evaluated and considered along with comments received from stakeholders, advisory committees, and boards and commissions, and will help County staff and officials determine what changes or revisions need to be made to the draft regulations. Additionally, staff will also consider the data collected through research and analysis, such as best practices exhibited by other jurisdictions both within Larimer County and outside. Ultimately, a decision on the final draft of STR regulations will be made by the Board of County Commissioners.

Note – In addition to comments received from the public, the project staff also received comments from the following organizations: Newell Warnock Water Association, Rocky Mountain National Park (RMNP), and Estes Valley Short Term Rental Alliance. Most of their specific comments have been incorporated into the summaries below; however, a short summary for each are provided following the public feedback portion of the document.

Public Comment	
Transferability	
	<u>SUMMARY:</u> Of those participants that provided feedback on transferability of STR license, it appears that participants continue to be split on the topic of transferability. It appears some believe that transferability should be allowed without restriction, while others feel that it should not be allowed at all. A handful of participants expressed support of a policy that would allow an exception to child and/or family inheritance or change of ownership from one member of the family to another.
	- Participants expressed support of Transferability generally - allowing the transfer of a STR license upon sale of the property
	- Participants expressed support of not allowing Transferability generally – should not allow the transfer of a STR license upon sale of the property.
	- Participants expressed that an exception on transferability should be given to child/family inheritance.

	<ul style="list-style-type: none"> - Expressed belief that if owner's children were unable to rent the property upon inheriting it, they would likely be forced to sell. Even if their children inherit the license with the property, if they ultimately sell the property without the ability to also transfer the license, it may have a detrimental impact to the valuation and ability to liquidate the property.
Topic	Public Comment
	<ul style="list-style-type: none"> - Participant indicated that they paid a premium price for their home because it had an existing STR license. Additionally, they have spent a lot of money upgrading the property to meet all the code requirements required by the process. Limiting transferability may impose a financial burden on the owners. - Participant believes that many short-term rental license holders have made substantial capital investments in their property to meet the life and safety requirements of licensure with the expectation that the license would be transferable upon sale of the property. Therefore, it would be patently unfair to those owners to retroactively make these licenses nontransferable since those owners would have no ability to recoup these license related expenses upon a sale of the property.
	<ul style="list-style-type: none"> - Limiting transferability may only shift the location of STRs in residential zones. The county should carefully consider whether the disruption to a new area caused by issuing a new license in a new location is worth any perceived benefits of a restriction on transferability. Without the restriction, STR licenses will tend to renew by successive owners, thereby keeping the status quo intact, as intended with the cap. With the restriction, STRs will be reduced in some residential areas only to be increased in other residential areas if upon a transfer the transferee goes to the end of the waiting list.
	<ul style="list-style-type: none"> - Participants expressed support of Transferability Option 1 – allowing the transfer of a STR license upon sale of the property but allowing the new property more than 30 days to notify the County. The notice period should be increased to at least 60 days. - Participants expressed support of Transferability Option 1 – allowing the transfer of a STR license upon sale of the property but allowing the new property more than 30 days to notify the County. The notice period should be increased to at least 90 days with an ability to request an extension under extraordinary circumstances.
	<ul style="list-style-type: none"> - If transfer of license is allowed, it was suggested that the County require a fee.
	<ul style="list-style-type: none"> - It is the opinion of the participant that the real concern for owner/investors and realtors is that realtors (and/or the market) have placed a premium on an STR for resale and removing that is a loss in commission and profits for those investors. Investing in anything has inherent risks and investing in an STR is or should be no different. There should be no guarantee of increased resale value simply due a certificate to operate a business in a residential area.
	<ul style="list-style-type: none"> - Belief that the proposal does not affect one license holder, it affect the entire family.
	<ul style="list-style-type: none"> - Participant would support a policy that would allow existing STR license to transfer, but not allow new STR license to transfer.
	<ul style="list-style-type: none"> - It was expressed that short-term rental operators are business owners and invest substantially in their business assets (the property). They should have the right to sell their business assets and transfer the license.

Topic	Public Comment
	<ul style="list-style-type: none"> - Participant indicated that some members of the community claim they want to preserve their investment in obtaining a STR license. However, this is not the County's responsibility. If a person runs a business, then they should have the business acumen to set up an LLC or C-Corp and deduct those expenses against their revenues. It is their belief that nobody, particularly the County, has any responsibility to preserve any business' investment in perpetuity, and certainly not to provide a continued return on a private investment, it would be inappropriate for the County to do so. - If the County allows an STR license to transfer unabated, it may then exist in perpetuity as the right to transfer the STR would cascade down through those who received the benefits of that right. The participant questioned when that would stop. Ultimately, transferred STR licenses would dominate this space and virtually no new licenses would become available. - The participant asked how a transferred license would be dated. Would it be the date of the original possibly "grandfathered" license, or would it be the date of the transfer and thus applicable to the most current regulations? If not the latter, the County would be denied the ability to effect change to meet new challenges and changes in land use and demography if a "grandfathered" STR could transfer their obsolete rights along with the license. - It was expressed that a STR is a privilege, not a right, of the homeowner and it should end with that homeowner. The homeowner should have no right to interfere with others seeking an STR license just because they have an STR license, it does not grant them that privilege.
	<ul style="list-style-type: none"> - Participants noted it is the intention of some property owners to pass the property from generation to generation in the future. The participant believes that a rental license should follow the property and limiting this to one transfer seems unfair. This suggested policy seems to punish future generations where no crime has been committed.
	<ul style="list-style-type: none"> - Believes that the STR license must remain distinct from the real estate. The County should not create an interest in real estate as a legal appurtenance that runs with the land.
	<ul style="list-style-type: none"> - Participant stated that not allowing the transfer of the STR license would not only reduce the practice of outside developers "buying up" properties in residential areas as investment properties, but it would also require the new STR owners to demonstrate that the property continues to meet the requirements of the regulations.
	<ul style="list-style-type: none"> - Given the existing cap on residentially zoned properties in the Estes Valley, STR licenses should not transfer with the property when it is sold. - The County has a waiting list for STR licenses in the Estes Valley. In fairness to those on the waiting list, STR licenses for properties sold should go into the pool of available licenses. In this way, everyone has an equal opportunity to acquire a license as determined by their position on the waiting list.
	<ul style="list-style-type: none"> - Participant believes that it is wrong to remove the significant piece of property that we purchased, being the ongoing, transferrable, permitted use as a full-time short-term rental, without just compensation. The act of doing such being tantamount to a violation of our 5th amendment rights.

Topic	Public Comment
Housing	
	<u>SUMMARY:</u> Participants providing feedback on workforce house generally appear to be split on the topic and the impact STRs have on workforce housing stock. While some firmly believe there is a correlation between STRs and the loss of work force housing, others do not agree with this assessment.
	<ul style="list-style-type: none"> - Participants expressed concern about the housing issues in Estes Park and the impacts that STRs have on the community.
	<ul style="list-style-type: none"> - Participants stated that the housing stock represented by high-end vacation homes used part-time as short-term rentals is too expensive to be directly relevant to the possible solution set for the affordable workforce housing problem; restricting their operation as short-term rentals would be punitive without generating any positive contribution to solving the workforce housing problem.
	<ul style="list-style-type: none"> - The County should encourage long term rentals so that professionals and families can make a home in the Estes Valley rather than creating a tourist filled neighborhood.
	<ul style="list-style-type: none"> - Believes that most vacation homes or STRs are well outside of reach of the hourly wage-earner in Estes Park and would likely never be a part of workforce housing.
	<ul style="list-style-type: none"> - Participant encourages the County to recognize that not all short-term rentals in the Estes Valley are negatively impacting the availability of workforce housing. Vacation homes/STRs in a well-managed rental program generate significant revenue for the local economy; some of which could be applied to workforce housing programs.
	<ul style="list-style-type: none"> - Belief that Estes Park workforce housing has been negatively impacted by so many residential homes being removed from the housing pool. - Homes used as STRs take properties away from the pool of owner-occupied and long-term rental housing, both of which are in extremely short supply. Reducing the number of STRs in residential zones will increase the pool of housing available for the workforce through ownership and long-term rental.
	<ul style="list-style-type: none"> - The County and Estes Park should focus on increasing workforce housing supply by building more low-end housing.
	<ul style="list-style-type: none"> - Participant does not believe that eliminating the tax revenue generated by STRs is the right way to address housing needs of those that have been priced out of the Estes Park community.
	<ul style="list-style-type: none"> - Belief that short-term rentals have become a convenient scapegoat for decreased affordable housing which instead is objectively and verifiably a result of macroeconomics of a broader scale.
	<ul style="list-style-type: none"> - Participant does not agree that the taxes collected from STRs would help in the long run with affordable housing. They have been singing the affordable housing song for as long as they have lived in the Estes Valley, and the problem persists.
	<ul style="list-style-type: none"> - Prohibiting STRs in residential neighborhoods restricts only one type of rental. In fact, doing so may increase homeowner interest in renting out their property for longer than 30 days - and Estes needs more long-term rentals. The participant indicated that they are a member of the Estes Park Housing Facebook page and stated that many of the people who are looking for housing in Estes are open to renting for less than a year. Because renting out a home as an STR is more profitable, the long-term rental market can be negatively impacted by STR growth

	within a community.
Topic	Public Comment
	<ul style="list-style-type: none"> - The County should consider a provision that exempts homes, from the STR regulations, that have an assessed value in excess of \$XXX, being a value that would certainly not be a home that would be rented for a rental rate low enough to be attractive for a work-force housing.
	<ul style="list-style-type: none"> - The County and Town officials and elected boards are doing the right thing by listening to the vast majority of residents about the disruptive nature of Short-Term Rentals in quiet residential neighborhoods.
	<ul style="list-style-type: none"> - Participant believes that STRs are responsible for the extreme rise in real estate prices, which has created unaffordable monthly rental fees for the working class of Estes Park, exacerbating the need for more and more “affordable” housing to be built.
	<ul style="list-style-type: none"> - Concern was expressed that if all the smaller dwellings are converted into short term rentals, the community would always lack housing for the work force.
Caps/Density	
	<p>SUMMARY: Overall, it appears that those participants providing feedback on the density of STRs generally support the continuation of the existing STR cap that limits the allowed number of STRs in residential zoning districts in the Estes Valley. Some participants suggest a policy that limits the distance between approved STRs, while others believe there is no need to further control density beyond the cap.</p>
	<ul style="list-style-type: none"> - Participant asked the County to continue to limit the number of STRs in the Estes Valley, in order to preserve its residential character.
	<ul style="list-style-type: none"> - If STRs are allowed in residential areas, the distance between approved STRs should be limited. For example, the County should not allow two STRs on the same short street or concentrations of multiple units in a small area. They should be widely dispersed (1000'+) so that no permanent resident must deal with more than a single STR.
	<ul style="list-style-type: none"> - Expressed belief that short term rentals should be banned outright.
	<ul style="list-style-type: none"> - If an immediate and complete prohibition on STRs in residential areas cannot be accomplished, the existing cap in residential areas should be decreased over the years as the current STRs expire by attrition, sale, and transfer of the property.
	<ul style="list-style-type: none"> - Believes that when one residential property is surrounded by STRs, that should be considered a commercial zone.
	<ul style="list-style-type: none"> - STRs benefit the Estes Valley and the total number has already been capped. As more construction occurs to keep up with demand the percentage of STRs may already be naturally decreasing.
	<ul style="list-style-type: none"> - EVSTRA objects to either of the two options presented regarding short-term rentals in residential zones but supports maintenance of the cap, as they believe the cap best serves the objective of limiting short-term rentals in residential zones without adversely affecting the interests of the residents of the Estes Valley.
	<ul style="list-style-type: none"> - Participants feel that density restrictions may be discriminatory against individuals who own condos that may naturally have more density than a large subdivision.
	<ul style="list-style-type: none"> - Participant suggested that the existing cap in the Estes Valley be reduced.

Topic	Public Comment
Residential Areas	
	<u>SUMMARY:</u> A significant number of participants providing feedback on the location of STRs believe that STRs do not belong in residential areas because they are businesses or commercial uses.
	<ul style="list-style-type: none"> - STR license should not be granted to any property located within a residential area. Short-Term Rentals are businesses.
	<ul style="list-style-type: none"> - Participants believe that the number of STR licenses in residential neighborhoods should be reduced and eventually eliminated. STRs generate noise, traffic, partying, trespassing, and parking problems, among other issues. They are incompatible with our quiet residential neighborhoods.
	<ul style="list-style-type: none"> - Participant would ask that the County continue to allow STRs in residentially zoned areas.
	<ul style="list-style-type: none"> - It is the participants opinion that all short-term rentals should be considered commercial entities, and as such, are more suited as a commercial development in areas with current established infrastructure, emergency services and easy ingress/egress. Leave the residential areas for their intended purpose. Simply put, the participant requests that the County not integrate small family run motels into the fabric we call neighborhoods.
	<ul style="list-style-type: none"> - EVSTRA does not believe that reducing the number of short-term rentals in residential zones is in the best interest of the Estes Valley community.
	<ul style="list-style-type: none"> - Participant believes that guests who stay at a STR have no long-term commitment to our residential neighborhoods, do not respect our neighborhoods, nor do they respect our residents who have a big investment in maintaining our property and our environment. Strangers who come here may want to “enjoy” our environment, but they take NO responsibility in protecting it while they are here.
	<ul style="list-style-type: none"> - Expressed belief that STRs degrade residential neighborhoods and cause speculative inflation in property values that makes housing unaffordable in the general area of the STRs. This effect grows exponentially with the total number of STRs in a broad region and is further compounded by high-density of STRs. The residents are denied the expected amenities of a residentially zoned area when numerous units are converted to STRs, or if multiple units in near proximity are converted.
Approval/Review Process	
	<u>SUMMARY:</u> Input from participants commenting on the approval/review process, suggested some mixed opinions on neighbor notification. Some expressed that they believe too much emphasis is placed on neighbor comments while others expressed that more neighbors need to be notified of pending STR applications and/or of a newly approved STR. Comments received suggest support of an easier approval process for STRs located in the Accommodations zoning districts while other STRs applications should require a public hearing.
	<ul style="list-style-type: none"> - Suggested that the neighbor notification should be extended beyond 500-feet to at least one mile.
	<ul style="list-style-type: none"> - Believes that the current approval process places too much weight on neighbor comments or feedback.
	<ul style="list-style-type: none"> - Participant believes that because the EV A1 is an accommodations zoning with the specific intent of allowing low intensity accommodations the approval process should be staff level. ASTR located in the EV A1 zoning should not be required to go to BCC.
	<ul style="list-style-type: none"> - Supports revision to regulations that would require a public hearing before the BCC. (Admin Special Review with

	BCC hearing.)
Topic	Public Comment
	<ul style="list-style-type: none"> - As a full-time resident, this participant expressed that they feel it is time consuming and stressful to respond to an application for an STR. It is stressful to worry about what kind of impact it will make.
	<ul style="list-style-type: none"> - A participant suggested the following language: the short-term rental property is within 100 feet of the boundary of a residential dwelling, it shall be referred to the neighboring homeowner for approval. The applicant shall mitigate potential impacts to the neighboring property, residents, children, and other stakeholders. Short-term rentals may not adversely impact or change the character of a neighborhood.
	<ul style="list-style-type: none"> - If a neighbor appeals the County's decision and are required to go before the Board of County Commissioners (BCC), the appeal application fee should be comparable to what the STR owner pays to get a home ready for safety features for inspection, permits, and application fees.
	<ul style="list-style-type: none"> - Believes that the County should increase fees on short term vacation rentals to cover additional administration and oversight costs.
Enforcement	
	<p><u>SUMMARY:</u> Overall, a significant portion of those participants that provided comments on code enforcement believe that the County should improve enforcement of existing STR regulations, including increased penalty for those who are operating without approval and repeat violators. Additionally, the existing system to report concerns or complaints appears to be ineffective. A notable number of participants believe that the County should concentrate on improving enforcement of STR regulations rather than creating more regulations.</p>
	<ul style="list-style-type: none"> - Participant urges the County to consider doing less in the regulatory area rather than more, and to concentrate on enforcement. If a STR owner does not conduct their rental in a professional manner, then shut them down.
	<ul style="list-style-type: none"> - The County should implement a use-it-or-lose-it policy in the regulations.
	<ul style="list-style-type: none"> - The burden is placed on adjacent neighbors to complain or confront the STR guests whenever guests are violating noise, parking, lights, and other STR standards.
	<ul style="list-style-type: none"> - Concerned that new regulations present significant new administrative burdens on the County which would impose unnecessary costs on taxpayers and strain limited County resources.
	<ul style="list-style-type: none"> - Any party operating a STR (or any other lodging establishment) without the applicable permit should be prosecuted and weeded out. This should be a priority.
	<ul style="list-style-type: none"> - Participant believes that calls to the vacation home hotline, Town, and/or County are useless for any immediate fix; therefore, many neighbors do not call them anymore and take action themselves.
	<ul style="list-style-type: none"> - Participant believes that if there is no monetary penalty for a violation, there is little incentive to quickly remedy an issue. - Believes that the County needs immediate and monetary punitive remedies against STR owner/investors, property managers, and renters when there is a violation. These penalties should be clear and unwavering in their enforcement. The County's three strikes policy appears to not be working. Renters, owner/investors, and property managers should all receive fines for infractions.

Topic	Public Comment
	<ul style="list-style-type: none"> - The County should aggressively go after unlicensed short-term rentals and impose significant penalties for unlicensed short-term rentals that continue to violate County regulations after notification from County officials.
	<ul style="list-style-type: none"> - Thorough consideration should be given to the impact of the ability of the County to effectively enact and enforce the additional regulations. As proposed regulations seem a great deal more complicated than the existing regulations.
	<ul style="list-style-type: none"> - Improved regulations should be given some “teeth” so there are punitive measures that can quickly take place.
	<ul style="list-style-type: none"> - STRs owners have no right to dictate the terms under which complaints can be filed, or whom they can be filed with, that is at the discretion of the complainant. If a complainant feels calling the Police is justified, they can, regardless of any provision the County makes in the regulations. The County cannot impinge on the rights of the individual as some have requested and following the complaint process in the regs does not preclude a citizen's right to complain to any authority they deem appropriate. The complaint process is for the benefit of those individuals affected by the STR, not for the STR. STR owners have no right to dictate that process nor sway it to their advantage.
	<ul style="list-style-type: none"> - The issue of new permits and renewing existing permits and the time frame to come into compliance is not clear. Participant stated that they know that Larimer County is not/has not issued new permits recently, primarily because of potentially unjustified objections from neighbors. There is considerable concern regarding this issue and the County should be amenable to a fair and equitable approach to existing STR and bringing them into full compliance. This is also an issue where Estes Valley is different than an urban area.
	<ul style="list-style-type: none"> - The participant found the lack of discussion regarding enforcement of current regulations to be of significant concern. If compatibility is a driving concern, then management and coordination of a response system would be more appropriate than more layered restrictions. Of deep concern is that the current proposal does not discuss a call center or coordinated effort to assist with resolving said rental concerns. The lack of this as a component further speaks to a hidden agenda driving Larimer County to be ultra-restrictive in STR licensure.
	<ul style="list-style-type: none"> - Participant suggests that complaints from residents who freely purchased property in an obviously tourist-driven economy, are very typical and easy to address. If Larimer County simply enforced basic, fair regulations that already exist - perhaps with a few tweaks, then most complaints would go away. Lack of enforcement always leads to abuse. - If the County simply honored residents' complaints with oversight and enforcement there would be no need to over-regulate the industry with a list of strangely specific rules.
	<ul style="list-style-type: none"> - Most of the citizen complaints about vacation rentals are the same complaints as are made with other residential properties, whether long-term rentals or owner-occupied properties – noise, parking and trespassing. There is no evidence that these complaints are more prevalent with short-term rentals which are rented for less than a year than long-term rentals or owner-occupied properties occupied for the entire year. Limiting the number of days rented does nothing to address the true problem – lack of adequate enforcement of existing regulations. Additional regulation would not solve a problem that is an enforcement issue.
	<ul style="list-style-type: none"> - Participant expressed that those complaints made to an absentee owner went unheeded, so they ended up calling

	<p>the police multiple times. The “rental” complaint number on the STR postcard was totally useless. Every time they called to register a complaint, there was never any follow-up. They think that the “complaint” number is just a ploy to make residents feel they are being listened to – when, as it appears, nothing is further from the truth. Even the people answering that number never knew what happened next. There needs to be a call back to acknowledge the person’s complaint and let them know what has been done.</p>
Topic	Public Comment
	<ul style="list-style-type: none"> - It was suggested that all STRs be required to install decibel meters as a condition of approval.
	<ul style="list-style-type: none"> - There should be an educational push so everyone knows who to call in case of a noise or nuisance complaint.
Life Safety Inspections	
	<p><u>SUMMARY:</u> Of the participants that provided comments on the proposed changes to the Life Safety Inspection requirement, several participants expressed support of requiring a Life Safety Re-Inspection every few years, with the potential of allowing owners to self-certify that the STR continues to meet safety requirements during the off years. Generally, participants do not see a benefit to having re-inspections every year.</p>
	<ul style="list-style-type: none"> - Participant would be in support of a policy that requires re-inspections every 3-5 years.
	<ul style="list-style-type: none"> - Suggest that a policy be created that would require the STR owner to self-certify that the STR continues to meet safety requirements in the years between inspections.
	<ul style="list-style-type: none"> - As a current STR owners, supports periodic inspections. They personally believe this would be a great idea for the safety of their guests.
	<ul style="list-style-type: none"> - Expressed belief that no one is going to invest in safety improvements to meet code requirements, just to later dismantle the improvements. There is no need for periodic home safety inspections after the original licensing of a homeowner. Participant believes that if their home meets standards for their own family to live there, then it meets standards for your family to live there. Periodic compliance attestations could be considered. Participant stated that if the EVPAC insists on frequent on-site inspections, then EVPAC should pay for them out of their budget. That way EVPAC would be keenly aware of the value of those inspections; EVPAC may not find them to be cost effective.
	<ul style="list-style-type: none"> - Requiring annual inspections would be expensive for the County and cumbersome for the owners. This participant stated that they are responsible owners and maintain their condo and all permit inspection requirements completely.
	<ul style="list-style-type: none"> - The participant stated that the cost of meeting regulations is a cost of doing business. If the STR owner cannot meet the regulations or cannot afford to meet the regulations, then they should not be in the STR business. That is what regulations are for. It is particularly egregious that STR owner complaints undermine life safety regulations. The County should continue to do their good job of asserting those protections; it is not bound nor is it appropriate to subsidize private business by relaxing citizen and guest safety concerns.
	<ul style="list-style-type: none"> - EVSTRA does not believe that reinspection upon license renewal would be necessary or appropriate. Owners should be required to self-certify continuous compliance with licensing requirements on renewal and reinspection should only be required upon a failure to certify continued compliance or upon any material changes made to the property. More frequent reinspection is a waste of county resources and an unnecessary cost to the owner.

Topic	Public Comment
Re-registration	
	SUMMARY: Of those participants that provided comments on the proposed re-registration standards, participants generally support a re-registration process taking place every 1-2 years for all approved STRs.
	<ul style="list-style-type: none"> - Participants suggested that re-registration should take place every two years and timed appropriately with inspections.
	<ul style="list-style-type: none"> - Believes that an annual re-registration is probably more frequent than necessary once all the requirements are met and the permit is granted.
	<ul style="list-style-type: none"> - Any existing STR license should be renewed at least annually and at that time should be required to have no open complaints. The owner should also be required to have taken steps to remedy any past complaints and steps to prevent complaints from reoccurring. If this has not been met, the licenses should not be renewed.
Roadway and Driveway Standards	
	SUMMARY: Overall, those participants that provided comments on the proposed roadway and driveway standards believe that the standards are unreasonable and would exclude most mountain properties.
	<ul style="list-style-type: none"> - Many mountain properties may not meet the restrictive local roadway access and driveway requirements. Proposed standard is not reasonable.
	<ul style="list-style-type: none"> - Suggested that a warning about road access and emergency access should be communicated to all STR guests.
	<ul style="list-style-type: none"> - The regulation regarding driveway width and turning radius is clearly meant to be restrictive and punitive. This restriction applied like a blanket requirement is simply not reasonable and seems recommended for punitive purpose then common sense.
	<ul style="list-style-type: none"> - Regarding the proposed driveway requirements, the participants have a strong conviction that driveways in Larimer County should have been approved or not approved when the home was built. If it was not safe, the building permit should not be granted. With the current proposed changes, many STR owners would not be able to make the changes.
	<ul style="list-style-type: none"> - EVSTRA believes that the extensive roadway and driveway requirements of the proposed regulations are inappropriate in a mountain community with many private roads and roadways that cannot be expected to meet requirements applicable to a town in the flatlands containing more regular streets. While EVSTRA understands the desirability of meeting all requirements for emergency services and evacuation, they believe those desires are aspirational in a mountain community and have not been imposed in residential areas in the past. It is EVSTRAs belief that there is no valid reason for selectively adding these requirements to short-term rentals when not applicable to other homes in the neighborhood, particularly if the Entrance/Exit signing proposed in the regulations is adopted.
	<ul style="list-style-type: none"> - Participant believes that there should be no relaxation of Safety Code. They have heard requests ranging from relaxing access requirements for emergency vehicles to being able to allow advertising unlicensed sleeping spaces since renters would use them anyway; there couldn't be any more ridiculous argument than to justifying negating code because people won't follow it - seeing that the renters do follow it is the County's responsibility.

	<ul style="list-style-type: none"> - Renters are not merely guests on a property or within the residence; they have rights including safety and convenience. It is much more than inviting guests into your home. You would not make any such allowances for a hotel.
Topic	Public Comment
	<ul style="list-style-type: none"> - Participant expressed that traffic generated by STRs is a major safety concern in neighborhoods with narrow roads and no sidewalks.
	<ul style="list-style-type: none"> - Believes that vacationing visitors add far more traffic proportionally than their vehicle numbers because they are traveling in and out of the neighborhood far more frequently than the residents themselves.
Wildfire Safety Standards	
	<p><u>SUMMARY:</u> The participants providing feedback on wildfire safety suggested that the County consider policy that would restrict or prohibit STRs in certain wildfire hazard areas.</p>
	<ul style="list-style-type: none"> - In the Draft Regulations the County has indicated that STRs may not be permitted in "floodway" areas due to the possible risk to public safety if a weather event were to occur that resulted in flooding. The participant believes this is on the right track but would suggest that the County not allow STRs in certain wildfire hazard areas. - The County should also consider allowing / disallowing STRs on the basis of the Insurance Service Office (ISO) rating of an area. For example - many of people, including the participant, live in rural Wildland Urban Interface (WUI) communities with ISO scores of 10/10 - meaning the highest risk for wildfire.
	<ul style="list-style-type: none"> - The participant encourages the County to consider regulation that prohibits STRs within the Wildland Urban Interface (WUI). Short-Term Rentals should be prohibited in neighborhoods where sixty percent or more of the homes are classified as Extreme Hazard or Severe Hazard for fire risk. - For prospective Short-Term Rental properties situated in the WUI, if their WUI rating is less than Extreme or Severe Hazard, the STR application should be referred to the applicable fire district for a wildland threat analysis including topographical location of the property, road grade, ingress/egress, availability of water and other firefighting resources, and accessibility of the property for emergency services. The applicable should look at the surrounding properties on a street and in the neighboring community to assess the broader risk of fire and safety to the residents as well as the public safety of the community at large to determine the feasibility of allowing a STR.
	<ul style="list-style-type: none"> - STRS should be prohibited in and around high fire danger zones/within ## miles (dependent upon fire response). In remote areas, where fire response is slower than in a city, there should be consideration for how fast a fire and can move and how fast a response can be made. For instance, if the fire response is 15 minutes and fires on average move 5 mile per hour, then the area around the high fire danger location, plus a circle of 1.25 miles (.25 percent of rate of movement), should be restricted from STR permits.
	<ul style="list-style-type: none"> - The participant believes that the proposed language for adequate water supply for firefighting does not accurately reflect how fires are actually fought. Since a fire department is literally unable to access public water taps on private property in addition to wells, the language should reflect that. The participant would like to propose that "fire department access to the homes water source" be removed. This actually reflects reality and how a structure fire is handled by our fire departments. - It is the participant's understanding that fire departments do full assessments of properties before approving STRs

	for use. For instance, Loveland Fire does a complete property assessment which includes appropriate access and code requirements compliance. This assessment includes determining if the house is accessible by the fire department and is safe for the intended use. This process is currently working appropriately as is and doesn't need further restriction in the form of a required on-site water source. Properties that don't have an on-site hydrant would be unfairly eliminated from qualifying.
Topic	Public Comment
Other STR Standards	
	SUMMARY: Several participants provided feedback on some of the proposed use standards, such as energy efficiency standards and property manager commute times, while some participants suggested standards not currently included in the initial public discussion draft. Those are noted below and include standards related to dark sky and cigarette/cigar smoking and disposal.
	<ul style="list-style-type: none"> - The Estes Valley dark sky lighting requirements should be applied to STRs in the Estes Valley.
	<ul style="list-style-type: none"> - Suggests a standard that requires owners to designate a smoking area, container for cigarette/cigar butts and ashes, and prohibiting fireworks and other open flames on a property. Fireworks should be prohibited all months of the year.
	<ul style="list-style-type: none"> - Allowing the STR property manager to live one hour away is too far away. If there is a significant problem, a shorter response time may be important and would be more considerate of neighbors.
	<ul style="list-style-type: none"> - Regarding the proposed energy efficiency standards - Energy efficiency standards should not be considered. Those standards are something that may already be handled on the construction end of things when a home is built. If the County wants property owners to upgrade the energy efficiency of their property, then all property owners should be required to do the same. If the County singles out STRs, it would be purely punitive let alone unfair.
	<ul style="list-style-type: none"> - Regarding the proposed standard that would require that a property within 1,000 feet of public open space or park land would be required to mitigate impact on public resources and wildlife. This is nonsensical – very subjective and suggests the need for studies and significant cost and time to determine compliance – by both County and STR owner. Believes this does not meet reasonableness standard.
	<ul style="list-style-type: none"> - Requiring a VoIP system in each unit is excessive. The participant indicated that they work in Technology, and noted that much of the time, emergency services do not work correctly through these systems as the Internet Service Provider has the ability to change and shape network traffic coming from the phone. Additionally, the phone could be used for inappropriate services. There are other options such as emergency only communicators. participant believes there are better solutions for this.
STR Size Standards	
	SUMMARY: Some concern was expressed regarding how the County defines STR size (Small and Large). Generally, of those providing feedback on the size definitions, participants believe the number of guests per STR should be regulated.
	<ul style="list-style-type: none"> - Expressed concern with the idea of Large STRs (10+ guests) being full time STRs.
	<ul style="list-style-type: none"> - Participants believes there should be a greater distinction in the size of STRs. For instance, consider Small (4 or fewer guests), Medium (5 to 10 guests), and Large (11 or more guests).
	<ul style="list-style-type: none"> - Would suggest that the County keep the numbers of adults at two adults per room and then have some allowance

	for up to two children below X years of age.
Topic	Public Comment
	<ul style="list-style-type: none"> - Most homes are not normally occupied by 10 persons, regardless of the rooms available. To better protect the surrounding community, it seems it would be prudent to only allow a guest count that is more typical. One bedroom holds two persons (master) and each other bedroom holds 1. Seems this is more typical of how homes are used. More importantly, this formula would seem more in-line with the approved use of the home.
	<ul style="list-style-type: none"> - The participant stated that the limits to the number of guests in a single residence should absolutely be limited in residential neighborhoods.
Business/Economy	
	<u>SUMMARY:</u> Many of the participants providing feedback related to the economy, expressed concern that further restricting and/or limiting the number of STRs would have a negative impact on the economy of Estes Park in particular, and would impact the recently approved initiative 6E. Additionally, some expressed concern that the regulations would negatively impact tourism in Estes Valley.
	<ul style="list-style-type: none"> - Believes that some of the regulations if enacted would have a major impact on local businesses, lodging tax revenue, and sales tax revenues, including initiative 6E.
	<ul style="list-style-type: none"> - STRs bring in visitors that spend money with local businesses and make the economy strong. Regulating STRs would hurt the local businesses. - Tourism is the driver of the economy in the Estes Valley and the economic benefits of STRs should be assessed in conjunction with this effort.
	<ul style="list-style-type: none"> - If visitors cannot find affordable places to stay during their visit, the current level of out-of-town dollars coming into Estes Park would decline. Without lodging options, this will impact visitors to the area. - If tourists can't find available rentals in this area, they simply would not come to Estes Park. Our tourists are accustomed to renting such properties and would take their business to other cities and towns outside the Estes Valley. The same is true for those of us making long-term investments in the area.
	<ul style="list-style-type: none"> - Short-term rentals play an important role in maintaining strong employment for the community - employing housekeepers, property managers, support staff, maintenance staff, laundry services, plumbers, electricians, hot tub companies, window washers, pest control and chimney sweeps - many of which have built their businesses around short-term rentals.
	<ul style="list-style-type: none"> - STRs bring many guests to the Valley, spending several million dollars in the Estes Valley every year providing over a half a million dollars in sales taxes for public services with the passing of ballot measure 6E. This also provides substantial funds annually for community workforce housing and childcare programs
	<ul style="list-style-type: none"> - Participant suggested that a massive abundance of established short term lodging establishments already exist in designated accommodation zoned areas, and the number of rooms continues to grow every year to fund 6E. The already existing abundance of STRs that have proliferated throughout the downtown zone and along accommodations corridors will provide plentiful funding for the 6E initiative.

Topic	Public Comment
Taxes	
	<u>SUMMARY:</u> Several participants who provided comments related to taxing STRs, would like to see STRs taxed differently than non-STR residential properties.
	<ul style="list-style-type: none"> - Participant suggests that the County create a regulation that requires STRs, that are not occupied full time by the owner, to be considered Commercial Property and therefore pay commercial property rates.
	<ul style="list-style-type: none"> - STRs create tax inequality, skew valuations higher for neighboring non rental properties, and are bad tax policy.
	<ul style="list-style-type: none"> - This participant endorses the concept of mandatory "bed tax" (or some other name) to fund a county office that responds to complaint and concern calls, to be assessed to the renters. There could be smooth collaboration between this center, owners, and managers to continuously improve the system and the STR industry.
Permit Types	
	<u>SUMMARY:</u> Of the participants that provided feedback on the proposed permit types, 'Limited' and 'Full', the majority expressed that they are not in favor of limiting the number of days a STR can be rented per year.
	<ul style="list-style-type: none"> - Expressed that they are not in favor of limiting the days in which a STR can be rented – 'Limited' permit. - A 'Limited' STR may be difficult to enforce.
	<ul style="list-style-type: none"> - The proposed regulation to limit the number of days rented per year appears arbitrary with no supporting data as to why this has been proposed.
	<ul style="list-style-type: none"> - The County appears to justify the distinction between "Full" and "Limited" STRs based on the alleged lesser impact on the neighborhood if the property is rented for a lesser number of days. However, the true objective of this distinction is to reduce the number of short-term rentals by making "Limited" Short-Term Rentals less economically viable.
	<ul style="list-style-type: none"> - A days rented limitation is a direct financial attack on a homeowner's rights to lease their property by taking away part of the productivity associated with the property. It is a direct incursion into the rights associated with property ownership. - In addition, limiting the nights rented would be difficult or impossible to enforce and would likely drive some vacation rentals underground, resulting in more dangerous housing for our visitors and a major reduction in sales and lodging taxes associated with vacation rentals.
	<ul style="list-style-type: none"> - The participant likes the idea to provide more specific "categories" of STRs to help gauge the compatibility of a project with an area; however, they believe this needs a bit more work, but it is heading in the right direction.
	<ul style="list-style-type: none"> - Suggests that the County define what is meant by "lives part-time" in the residence. It appears that some STR hosts claim they "live there part time" when in fact they bought the place expressly to turn it into an STR and visited it a couple of times. The "lives part-time" designation may be a loophole.
	<ul style="list-style-type: none"> - Believes that limiting the number of days per year a STR can be rented, currently proposed at 135 days, decreases demand for housing by telling a person they can only make money on their property 1/3 of the time. For current homeowners, this decreases the value of their home, so the County would be hurting the citizens they are supposed to be working for. Participant would suggest increasing the number to 250 days per year.

Topic	Public Comment
	<ul style="list-style-type: none"> - It was expressed that housing available for year-round residents should not have the residential character of the neighborhood destroyed by resort accommodations permanently located within their boundaries. Participant supports the limitation on the number of rental nights per seasonal year to the 135 nights proposed in the draft regulations.
	<ul style="list-style-type: none"> - Participant expressed that they were pleased to see that there is consideration of a limit to the number of days that a STR property could be rented per year.
HOAs/Windcliff	
	<u>SUMMARY:</u> Majority of the participants that provided comments on HOAs that support or encourage STRs in their communities, believe that those HOAs should not be subject to the County's STR regulations. Most of the comments received referred to the Windcliff Estates community.
	<ul style="list-style-type: none"> - Any additional STR regulations established by the County should not be applied to communities with active HOAs that currently allow or encourage STRs, such as Windcliff.
	<ul style="list-style-type: none"> - Windcliff has supported short-term rentals and has coexisted peacefully with full time residents for over 53 years. The governance of rentals is included in our HOA bylaws. The Windcliff property manager lives in the neighborhood and manages our homes with the upmost care and respect. Because of the attention to detail, many of the renters in our neighborhood are repeat customers who respect our homes, our community and the Estes Valley.
	<ul style="list-style-type: none"> - Regarding Windcliff Estates, the participant stated that if an HOA's recorded covenants/amendments permit and self-regulate the permissible and acceptable operation of STRs, the County should not further restrict, prohibit or impede the operation of STR's in any such residential zones in any way (caps, transferability, etc.).
	<ul style="list-style-type: none"> - Short term rentals are a core component of, and an HOA supported right of Windcliff Estates ownership. Increased aggressive actions against short-term rentals disguised as regulations destroys one of the key reasons people pursue ownership in Windcliff Estates.
Wildlife	
	<u>SUMMARY:</u> Participants request that STRs be required to provide wildlife/bear proof trash containers.
	<ul style="list-style-type: none"> - Participants expressed a significant concern about threats to wildlife in their area. The trash left out for many days is a direct threat to bears and neighborhood safety for persons. They have also seen loose dogs chasing deer and worry that STR guests may not understand their responsibilities in regard to animals.
	<ul style="list-style-type: none"> - All rentals in residential areas should be mandated to use wildlife/bear-proof trash containers. The participant believes there simply is not adequate management of non-bear-proof containers in rental units.
General	
	<u>SUMMARY:</u> The general comments received range in topic from suggestions on how to improve the update process to explanations as to why people choose to have STRs. Overall, participants appear to support some level of regulations that protect the safety of the community and encourage great neighborhoods. It appears that about half of the participants do not support changes to the STR regulations while about half of participants are in support of changes.
	<ul style="list-style-type: none"> - Would ask that the County slow down the process of updating the regulations and engage in a meaningful discussion with the those affected by these regulations.

	<ul style="list-style-type: none"> - Concerned that the proposed regulations are being rushed and have not had a reasonable amount of time for public review and comment.
Topic	Public Comment
	<ul style="list-style-type: none"> - Generally, support regulations that protect the safety of the community, encourage great neighborhoods, and that do not negatively impact financially the Town of Estes Park. - Not opposed to reasonable, fair, and equitable regulations. - In support of new regulations that create safe and well manages STRs in the Estes Valley.
	<ul style="list-style-type: none"> - Participants expressed that STR ownership currently supplements their retirement plan or is intended to in the future. Restrictions on STRs would affect the owners' interests.
	<ul style="list-style-type: none"> - Some participants do not support any changes to the STR regulations.
	<ul style="list-style-type: none"> - Some participants urge the adoption of more stringent regulations concerning STRs.
	<ul style="list-style-type: none"> - Participants indicated that renting their home as a STR generates the income necessary to cover the expenses of homeownership. - Participant would not otherwise be able to afford a second home without the income generated by the STR.
	<ul style="list-style-type: none"> - Participant expressed gratitude to the County for gathering input from all stakeholders, including from the community.
	<ul style="list-style-type: none"> - The addition of short-term rentals to residentially zoned neighborhood has added traffic, parking difficulties, noise, more people, more dogs, and more risk to neighboring homes. Additionally, trash has spread through the neighborhood due to poor containment practices, allowing bears to rummage through the trash.
	<ul style="list-style-type: none"> - Having a STR allows the property owner to use their home many times throughout the year whereas having a full-time rental does not provide this opportunity.
	<ul style="list-style-type: none"> - Unintended adverse consequences of updating the existing STR regulations should be considered.
	<ul style="list-style-type: none"> - The proposed regulations are confusing and need to be fully explained to the public.
	<ul style="list-style-type: none"> - Appears that the County wants to impose an extreme and confusing set of regulations without any idea of impact, enforcement, fairness, or meaningful impact from all affected parties. - It appears that the pursuit of making these changes are arbitrary and capricious.
	<ul style="list-style-type: none"> - Participants believe that the County should "grandfather" any current or existing STR license or use.
	<ul style="list-style-type: none"> - Participants believes that the County should not "grandfather" any current license or use.
	<ul style="list-style-type: none"> - Belief that the regulations are unfair. Leniency should be given to those STR owners who are not creating a disturbance in the neighborhood.
	<ul style="list-style-type: none"> - STR permits should not be issued for properties owned by corporations (including partnerships, trusts, joint ventures, etc.). Allowing corporate ownership of STRs essentially converts residential zoning to accommodation zoning by another name. Their investments in residential areas should be limited to long-term rental properties.
	<ul style="list-style-type: none"> - Participant stated that they are not opposed to STRs in the right high traffic and commercial areas. STRs have a place in the market but it should not be at the expense of residents who chose a residential area to live.
	<ul style="list-style-type: none"> - In support of STRs, but not as they are currently implemented in the Estes Valley. This participant would like to see at a minimum the changes being proposed in Option 2.

Topic	Public Comment
	<ul style="list-style-type: none"> - Would argue that long term rentals pose a far greater adverse effect on a neighborhood than the short-term rental ever could.
	<ul style="list-style-type: none"> - Expressed concern that those with a commercial interest are perhaps speaking with a louder voice than permanent residents.
	<ul style="list-style-type: none"> - Many guests/visitors have expressed that they prefer STRs over other rental types such as traditional hotels or shared stays and restricting STRs would limit the lodging options for visitors.
	<ul style="list-style-type: none"> - Concerned about how the proposed regulations will affect existing, approved STRs.
	<ul style="list-style-type: none"> - The participant indicated that they feel as though the suggested regulations infringes on their property rights and does not provide equal treatment. It is obvious that the County has an agenda and it is aimed at eliminating the right to own and rent a house out to others as a short-term rental.
	<ul style="list-style-type: none"> - In studying the regulations and watching the online meetings, this participant stated that they are struggling to see what the end goal is. They heard time and again that compliance and enforcement have been long time issues. They don't see mention in the regulations regarding this. The participant thinks spending time and digging deep into data is a better place to start than deciding on density and zoning issues. They suggested that the County create an easily accessible database where neighbors can see if a property has an STR license or not. In that same spreadsheet, the County could share the STR property management contact information as all properties are required to have a manager that is within an hour of the location. After a year of data collection, the County could make decisions based on the complaints and illegal rentals.
	<ul style="list-style-type: none"> - Appears that the County is trying to restrict or reduce the number of STRs without actually imposing a cap on the number.
	<ul style="list-style-type: none"> - During the webinar the here was feedback to the effect that proposed regulations on short term rentals are too restrictive. This participant would respectfully disagree
	<ul style="list-style-type: none"> - Believes that the vast majority of the community are ambivalent to what other folks do as long as they are following the law of the land use code and the process.
	<ul style="list-style-type: none"> - Believes that STRs create horrible living situations for full time permanent members of the community. Those of us are exposed to an invasion of VBRO transients "here today...gone tomorrow" who come to party without regard for the neighbors or the quiet enjoyment of our homes.
	<ul style="list-style-type: none"> - Concern was expressed that there is a lack of transparency in the requirement for additional restrictions and the participant suspects there is unshared information driving this process. The short timeline for comment and apparent expedited plans for imposition of significantly increased restrictions suggest such an agenda.
	<ul style="list-style-type: none"> - Participant understands that the County is trying to resolve issues that face many mountain and tourist communities nationwide: specifically, poorly managed short-term rental properties that impact the quality of life of permanent residents that live nearby, and the lack of availability of affordable housing for seasonal and other workers necessary to support the community and we share these concerns. However, the participant is concerned that the solutions put forth will not adequately resolve those issues and unfairly punish owners of respected short-

	term rentals ultimately forcing well managed STR's to cede their licenses to potentially untested and/or poorly managed properties.
Topic	Public Comment
	<ul style="list-style-type: none"> - It almost seems like the goal of these proposed regulations is to eliminate as many short-term rentals as possible without really establishing a cause-and-effect relationship that justifies the means.
	<ul style="list-style-type: none"> - Having lived next to a short-term rental for a period of time, this participant believes that I STRs are bad for communities, destroy neighborhoods, and present constant stress and worry for those living in their full-time homes amongst them.
	<ul style="list-style-type: none"> - The current requirements call for the STR application to demonstrate that they are 'compatible'; however, based upon experience with public hearings, the participant believes the concept of compatibility is very subjective and it appears difficult to "prove" one way or another.
	<ul style="list-style-type: none"> - The participant stated that there are several STR hosts that have said AirBnB has a no party rule, like that alone should alleviate concerns that the house would be rented for parties. However, there are several other websites that housing rentals can be posted on. The participant would recommend that the Land Use Code itself has a stipulation against "parties". - Participant asked if the County could add a clause to shut down an STR for any verifiable report of underage drinking? The participant suggests this because these events seem to be the most disruptive for individuals living next to STRs.
	<ul style="list-style-type: none"> - As a person who has lived next to a STR for over a decade, this participant finds zero issues with one or more in their own neighborhood. However, they would certainly not be of the same opinion should it not be a well-managed STR.
	<ul style="list-style-type: none"> - Expressed that investors are a growing concern. Investors have the ability to buy up homes and properties in communities for STRs. They are willing to pay more for homes and land because they are an investment. This makes it cost prohibitive for a family who wants to buy a home to live in, to compete with them. Families are priced out from buying a home competing with an investor who, can buy multiple homes, and sell them as a portfolio to other investors.
	<ul style="list-style-type: none"> - Participant believes that people will not stop coming to Estes, the National Park is too popular and too accessible; however, the decisions the County makes may determine if those coming would only be the wealthy or would the Estes Valley be accessible to all families.
	<ul style="list-style-type: none"> - STR renters rent to behave as tourists, not residents, and their behavior differs greatly from residents in terms of respect for property boundaries and automobile and other traffic.
	<ul style="list-style-type: none"> - Expressed belief that quiet, safe, cohesive residential neighborhoods, where you don't have to wonder who your neighbor will be this week, are the foundation to a thriving community and there is only one industry that

	<p>completely erodes this foundation and that is STRs. Participant believes that allowing this industry to continue the path that it seeks, there will no longer be a foundation at all.</p> <ul style="list-style-type: none"> - Hundreds even thousands of single-family homes have been taken from the inventory leaving very little available for families to plant roots. The sad thing is, it is not just workforce in the sense of support staff for the tourist industry, but this effects teachers, nurses, police and other town personnel and so many other vital residents that make our town what it is.
Topic	Public Comment
	<ul style="list-style-type: none"> - Participant believes that visitors to the County, including Estes Valley, stay primarily in hotels, motels, or resorts. Neighborhoods should be for members of the community.
	<ul style="list-style-type: none"> - It was expressed that STRs are responsible for a shortage of groceries for residents, the complete and total erasure of community in residential areas, lack of sufficient infrastructure, dangerous evacuations during wildfires, lack of respect for wildlife, and the over-crowding of our recreational areas, including Rocky Mountain National Park.
	<ul style="list-style-type: none"> - Participant suggested that the County consider a five-year moratorium on any new STR licenses in Larimer County. A period of reevaluation could follow the moratorium once the time period is up.
	<ul style="list-style-type: none"> - Suggested that the Estes Valley STR regulations be consistent with the Town of Estes Park.

Additional Summaries

As noted early in this summary, in addition to comments received from the public, the project staff also received comments from the following organizations: Newell Warnock Water Association, Rocky Mountain National Park (RMNP), and Estes Valley Short Term Rental Alliance. Most of their specific comments have been incorporated into the summaries addressed above. A short summary of those comments is provided below.

Organization	Comment Summary
Newell Warnock Water Association (NWWA)	In their comments, Newell Warnock Water Association requested that the County postpone approval of any STR applications for properties within the NWWA distribution area due to existing infrastructure concerns. The Association requests that County and/or STR applicants consult with NWWA prior to moving forward with any STR application.
Rock Mountain National Park (RMNP)	Rocky Mountain National Park provided input on multiple topics including referral agency notification, STR definitions, and impacts to public lands. The park requests that the County forward all STR permit applications for properties adjacent to the park for review and comment, as a referral agency, so that their comments can be considered early in the process. The park supports the proposed STR permit types, 'Limited' and 'Full'. It is their belief this would help the park better understand use patterns of STRs. The park expressed appreciation for the proposed direction for incorporating public open/space impacts in reviews and the additional scrutiny for proposals within 1,000 feet of the boundary of a public open space or park land. Additionally, the park appreciated the attention to garbage storage, exterior lighting, quiet hours, and

	restrictions to exterior appliances within identified wildfire hazard areas. In their comments, the park provided items of consideration including fire protection, garbage, wildlife, visitor-created trails and park access, and night skies and natural quiet.
Estes Valley Short Term Rental Alliance (EVSTRA)	<p>The Estes Valley Short Term Rental Alliance provided input on multiple topics including unlicensed short-term rentals, enforcement, reduction in number of STRs in residential zones in Estes Valley, limitation on days rented ('Limited' and 'Full' permit types), residential zones permitting STRs, transferability, grandfathering, operations manual requirement, entrance/exit signing requirement, STR re-inspections, and proposed roadway and driveway requirements. In their comments, EVSTRA indicated that they believe in the reasonable regulation of STRs and vacation homes in the Estes Valley. Unregulated STRs risk life and safety violations which could endanger guests and neighbors. Additionally, it is EVSTRA's opinion that unregulated STRs likely would not be collecting lodging taxes and sales taxes, thereby impairing important sources of local financing for community needs. EVSTRA stated that advocates of the changes proposed in the new regulations have not been honest about the objectives of this initiative. It is apparent that the objective is to reduce the number of short-term rentals – not address the problems citizens have with certain short-term rentals, such as noise, parking and trespassing. The real citizen concerns are these issues, and those issues can only be addressed by more vigorous enforcement. The county should not make the mistake of thinking they are addressing the core issues when additional regulations will do little or nothing to mitigate those concerns. Enforcement of existing rules is the answer, not more regulation. EVSTRA supports vigorous enforcement of unlicensed short-term rentals and reasonable regulations for licensed short-term rentals, including the important life and safety issues associated with any lodging.</p> <p>In addition to comments pertaining to the initial public discussion draft, EVSTRA also provided an analysis of Estes Valley short-term rental/vacation home economic contribution to Estes Park and tax analysis. Those documents are included in the public comment raw data.</p>